

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DANIELLE CIRILLO, on behalf of herself)
and all others similarly situated,)
)
 Plaintiff,)
) Civil Action No.: 5:21-cv-00088-BO
 v.)
)
 CITRIX SYSTEMS, INC.,)
)
 Defendant.)
_____)

SABRINA STILES, on behalf of herself and)
all others similarly situated,)
)
 Plaintiff,)
) Civil Action No.: 5:23-cv-00060-BO
 v.)
)
 CITRIX SYSTEMS, INC.,)
)
 Defendant.)
_____)

**PLAINTIFFS' AMENDED UNOPPOSED MOTION FOR APPROVAL OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

For the reasons set forth in the accompanying Memorandum of Law, the Amended Declaration of Gilda Adriana Hernandez in Support of Plaintiffs' Unopposed Amended Motions for Approval of Attorneys' Fees and Service Awards ("GAH Decl."), Supplemental Brief in Support of Attorneys' Fees, and consistent with the terms of the Parties' Settlement Agreement,¹ Plaintiffs respectfully request that the Court enter an Order:

- (1) Awarding Class Counsel attorneys' fees of one-third (\$1,966,666.66) of the Gross

¹ Counsel for Plaintiffs has conferred with Counsel for Defendant, and, consistent with the terms of the Parties' Settlement Agreement, which has been presented to the Court for Preliminary Approval, Defendant does not oppose the instant motion.

Settlement Fund, which includes litigation costs and expenses incurred in prosecuting this action.

(2) Granting such other relief as the Court deems just and proper.

Respectfully submitted this October 4, 2023.

/s/ Gilda A. Hernandez

Gilda A. Hernandez (NCSB No. 36812)

Hannah B. Simmons (NCSB No. 59579)

**THE LAW OFFICES OF GILDA A.
HERNANDEZ, PLLC**

1020 Southhill Drive, Suite 130

Cary, NC 27513

Tel: (919) 741-8693

Fax: (919) 869-1853

ghernandez@gildahernandezlaw.com

hsimmons@gildahernandezlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2023, I electronically filed the foregoing true and accurate copy of **PLAINTIFFS' AMENDED UNOPPOSED MOTION FOR APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES** with the Court using the CM/ECF system, and have thereby electronically served the document to the following:

Frederick T. Smith
North Carolina Bar No. 45229
SEYFARTH SHAW LLP
121 W. Trade Street
Suite 2020
Charlotte, North Carolina 28202
Telephone: (704) 925-6023
fsmith@seyfarth.com

Noah A. Finkel
SEYFARTH SHAW LLP
233 South Wacker Drive, Suite 8000
Chicago, IL 60606
312-460-5913
312-460-7913 (fax)
nfinkel@seyfarth.com

Theresa M. Waugh
SEYFARTH SHAW LLP
121 West Trade Street, Suite 2020
Charlotte, North Carolina 28202
(704) 925-6064
twaugh@seyfarth.com
Florida Bar. No. 89593
Attorneys for Defendant

/s/ Gilda A. Hernandez
Gilda A. Hernandez (NCSB No. 36812)
Hannah B. Simmons (NCSB No. 59579)
**THE LAW OFFICES OF GILDA A.
HERNANDEZ, PLLC**
1020 Southhill Drive, Suite 130
Cary, NC 27513
Tel: (919) 741-8693
Fax: (919) 869-1853
ghernandez@gildahernandezlaw.com
hsimmons@gildahernandezlaw.com

Attorneys for Plaintiffs